

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE

In re:	CHAPTER 11
Isaacson Steel, Inc.	Case No. 11-12415-JMD
Isaacson Structural Steel, Inc.	Case No. 11-12416-JMD
Debtors	Jointly Administered

DEBTORS' MOTION FOR ORDER APPROVING CONFIRMATION ORDER

The Debtors in Possession, **Isaacson Steel, Inc. and Isaacson Structural Steel, Inc.** (collectively, the "Debtors"), respectfully move this Court as follows:

1. On October 28, 2013, this Court held a combined hearing on the adequacy of the Debtors' First Amended Disclosure Statement (the "Disclosure Statement") and the confirmation of the Debtors' First Amended Joint Plan of Reorganization for Isaacson Steel, Inc. and Isaacson Structural Steel, Inc. dated September 25, 2013 as Modified October 18, 2013 (the "Plan"). [*Doc. Nos. 1184 and 1225, amending Doc. No. 1183*].

2. After hearing all of the objections to the adequacy of the Disclosure Statement and the confirmation of the Plan, this Court entered an Order [Doc. No. 1252] which, among other things, ordered the Debtors to "file with the Court a proposed Order approving the Disclosure Statement and a proposed confirmation order" ("Proposed Confirmation Order") on or before **November 6, 2013** and asked the Debtors to circulate the Proposed Confirmation Order to the attorneys who participated in the hearing.

3. The Debtors have submitted a proposed Order approving the Disclosure Statement which should be non-controversial.

4. During the hearing, this Court made clear its intention to vacate in whole or in part its Order on Joint Motion for Interim Protective Order and Final Order Approving Global

Settlement Agreement Filed by Debtors, Creditors' Committee, New Hampshire Business Finance Authority, Passumpsic Savings Bank and Turner Construction, Inc. [Doc. No. 1186] (the "Global Settlement Approval Order") if it confirmed the Plan to eliminate procedural issues.

5. Counsel to the Debtors believe that this Court intends to enter its own Order vacating the Global Settlement Approval Order. Other counsel who participated in the hearing have different views. Accordingly, the Debtors prepared and will submit the two (2) slightly different Proposed Confirmation Orders accompanying this Motion, one of which includes a Paragraph 16(e) which vacates the Global Settlement Approval Order and one which does not address the issue.

6. If this Court elects to issue a separate Order vacating the Global Settlement Approval Order in whole or in part, the Debtors ask this Court consider including text similar to that proposed in Paragraph 16(e) of the Proposed Confirmation Order.

7. As directed by the Court, the Debtors circulated the Proposed Confirmation Order among counsel who participated in the hearing on two occasions.

WHEREFORE, the Debtors respectfully request this Court to enter one of the two Proposed Confirmation Orders and grant the Debtors such further relief as may prove to be fair and equitable or lawful.

Respectfully submitted,

DATED: November 6, 2013

/s/ William S. Gannon
William S. Gannon (BNH 01222)

ISAACSON STEEL, INC.
ISAACSON STRUCTURAL STEEL, INC.

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CERTIFICATE OF SERVICE

I hereby certify that on this date I served the foregoing pleading has been served on the following parties in interest by first class U.S. Mail or via the Court's CM/ECF system or in such other manner as may be indicated:

See attached Service List(s).

DATED: November 6, 2013

/s/ Beth E. Venuti
Beth E. Venuti

COMBINED APPEARANCES SERVICE LIST

In Re: Isaacson Steel, Inc., Chapter 11, Case No. 11-12415-JMD

In Re: Isaacson Structural Steel, Inc., Chapter 11, Case No. 11-12416-JMD

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for U.S. Trustee

Joshua Menard – ECF
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Edward C. Dial, Jr. – ECF
For Ford Motor Credit

Daniel Sklar – ECF
Holly Kilibarda – ECF
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David Azarian – ECF
For American Aerial Services

David Anderson – ECF
For Cate Street Capital

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James LaMontagne – ECF
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